

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROLAND C. ANDERSON,

Plaintiff,

v.

GENERAL MOTORS CORPORATION,

Defendant.

Civil Action No. 05-877-JJF

**AFFIDAVIT**

Terry Tyndall, being first duly sworn and of lawful age, hereby states as follows:

1. My name is Terry Tyndall. I am of lawful age and I am competent to testify to the matters set forth in this Affidavit.

2. I am currently a People Soft Administrator for General Motors Corporation's facility located in Wilmington, Delaware. I have personal knowledge of the facts stated herein and if called to testify as a witness in this action, I would testify truthfully and competently to each of the following facts set forth in this Affidavit.

3. In my capacity as a People Soft professional, I received some documents from a uniformed officer at the security gate. These documents appeared to relate to what I believed was a pending EEOC Complaint filed by Roland Anderson. These documents did not direct any action on GM's part and, therefore, I did not forward them to GM's Legal Department.

4. Because I believed the documents were file copies of documents related to a prior EEOC Complaint, I left them for my supervisor so they could be placed in the appropriate file.

5. I did not intentionally disregard the documents. I did not see any documents or summons requesting any action on GM's part.

6. Any failure to forward the documents to the Legal Department for processing was accidental on my part and not aimed at hindering the processing of this matter.

7. Further affiant sayeth not.

  
Terry Tyndall

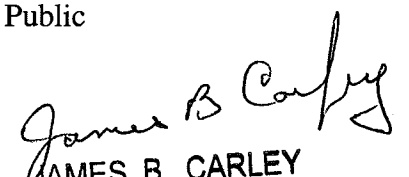
STATE OF DELAWARE    )  
                                      ) SS.  
COUNTY OF \_\_\_\_\_ )

On this \_\_\_\_\_ day of September, 2006, before me appeared Terry Tyndall, to me personally known, who being by me duly sworn, did state that the statements made in this Affidavit are true to the best of his knowledge and belief.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year last above written.

My Commission Expires:  
\_\_\_\_\_

\_\_\_\_\_  
Notary Public

 9/17/06  
JAMES B. CARLEY  
NOTARY PUBLIC  
STATE OF DELAWARE  
My Commission Expires Nov. 7, 2007